



OFFICE OF INSPECTOR GENERAL



DEPARTMENT OF THE INTERIOR

# RECOVERY OVERSIGHT ADVISORY

*A Critical Point Evaluation Product*






RECOVERY OVERSIGHT OFFICE  
Washington, DC 20240

SEP 18 2009

To: Chris Henderson  
Senior Advisor to the Secretary for Economic Recovery and Stimulus

From: Robert A. Knox   
Assistant Inspector General, Recovery Oversight Office

Subject: Recovery Oversight Advisory – Bureau Program Plans (ROO-ROA-MOA-1010-2009)

Congress provided us with funding to oversee and ensure accountability of the \$3 billion appropriated to the Department of the Interior (Department) in the American Recovery and Reinvestment Act of 2009 (Recovery Act or Act). To help safeguard these taxpayer dollars, we are focused on: preventing fraud, waste, and mismanagement of recovery and reinvestment dollars; early detection to reduce the impact of misuse when it does occur; and ensuring transparency in our oversight efforts. In a spirit of collaboration with the Department as it implements the massive programs envisioned under the Act, we discuss in this advisory our observations on the program plans required by the Office of Management and Budget (OMB).

We do not require an official response to this advisory, but we will post it on our website ([www.doi.ig.gov](http://www.doi.ig.gov)) and [Recovery.gov](http://Recovery.gov). Information contained in this advisory may also be included in our semi-annual reports to Congress. Please contact me if you have any questions.

## Background

The Recovery Act provides \$1 billion for the Bureau of Reclamation (BOR); \$750 million for the National Park Service (NPS); \$500 million for Bureau of Indian Affairs (BIA); \$320 million for the Bureau of Land Management (BLM); \$280 million for the U.S. Fish and Wildlife Service (FWS); and \$140 million for the U.S. Geological Survey (USGS). The Act appropriates an additional \$490 million to the Department of Transportation for Interior roads, as well as funding in other Departments that will consult with Interior on allocation.

To support implementation of the Recovery Act, OMB issued guidance titled “Updated Implementing Guidance for the American Recovery and Reinvestment Act of 2009” on April 3, 2009. The guidance required agencies to submit plans for each program funded by the Act. Section 2.8 of the guidance notes that “each agency’s Recovery Program Plan should be a summary of the specific Recovery Act projects and activities planned.”

For purposes of meeting the requirement of Section 2.8 of OMB’s guidance, the Department treated as a separate program: 1) each bureau that received Recovery Act funding; 2) Wildland Fire; 3) and the Central Utah Water Conservancy Program. The Department also developed standard language for inclusion in each plan. The Department and five of the eight

programs that received funding under the Recovery Act provided copies of draft program plans to us for review.<sup>1</sup> We also reviewed Departmental standard language that introduces each program's plan.

We provided our observations in draft to the Department and bureaus. Although we did not require a response, we received responses from the Department, FWS and USGS. We also received revised program plans for FWS, USGS, NPS, and BIA. This advisory summarizes our observations on the draft program plans and Departmental standard language provided to us, as well as responses received and actions taken that address our observations. We divide our observations into three sections: observations on program plan standard language, observations on bureau-specific plans that were addressed, and observations on bureau-specific plans that were not addressed.

While the majority of our observations were addressed, NPS and BIA did not address several critical areas. Specifically, NPS should be prepared to justify the use of cooperative agreements, but did not do so in its program plan. This justification is particularly critical when NPS uses both cooperative agreements and other procurement vehicles for the same project. Appropriate use of cooperative agreements has been a problem in the past. BIA should ensure it develops and documents oversight plans for and devotes adequate resources to Recovery Act projects, but did not describe such efforts in its program plans. Such plans and resources are particularly critical for school replacement and school improvement projects, areas that have experienced problems in the past. BIA should also ensure its timelines for completion are realistic. Although program plans are finalized, we encourage the Department and bureaus to consider those areas that have not been addressed as they move forward with implementation of Recovery Act projects.

We commend the Department and the bureaus for their openness and willingness to share documents and plans with us and to address our comments. We are encouraged by this increased transparency in their processes and their responsiveness to our observations. We look forward to continued collaborative efforts as the Department and the bureaus seek to implement Recovery Act projects effectively and ensure transparency in their efforts.

## **Program Plan Standard Language**

We reviewed the Departmental standard program plan language and provided our observations to the Department. The Department considered our input and revised the standard language. Our observations and the Department's response follow.

### *Expediency of Implementation*

We expressed concern that the Departmental draft standard language placed too much emphasis on "expediency" as a factor in the selection of projects, particularly given OMB's

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<sup>1</sup> Draft program plans from the Bureau of Reclamation, the Wildland Fire Program, and the Central Utah Water Conservancy Program were not available at the time of our review (we have since received a final program plan for the Central Utah Water Conservancy Program).

April 3, 2009 guidance directing agencies to develop transparent, merit-based selection criteria to guide their Recovery Act funding actions for grants and other financial assistance vehicles.

The Department agreed that “expediency” is an important factor, but not the most important. The Department clarified the standard language by stating that expediency “was a limiting factor that impacted other agency priorities considered during the selection process including meritorious projects that were not far enough along with design or permitting to be obligated by September 30, 2010.” The Department also noted that this criteria could not be uniformly applied across the bureaus because of the differences in project types and circumstances.

### *Monitoring and Evaluation*

The Department’s draft standard language stated that the Department was developing performance measures to ensure it met the Recovery Act’s accountability objectives. The Department’s measures, as stated in the draft language, focused on: maximum use of competitive awards, timely implementation and expenditure of funds, successful completion of planned work, and minimal cost overruns and improper payments. We noted that several factors (e.g. job creation, health and safety, and energy efficiency) specified by the Department as criteria for project selection were not mentioned in this list of measures.

The Department clarified the standard language to note that performance measures were being developed “to monitor progress made in accomplishing stated work goals and to ensure financial and procurement practices are executed responsibly.”

### *Priorities*

The Department described the process used to prioritize projects in the draft standard language, but there were inconsistencies between the description and data we reviewed in bureau project plans. The language noted that bureaus annually update 5-year plans, which identify deferred maintenance and construction needs. Recovery Act projects addressing these needs are given a “DOI score” based on several categories such as critical health and safety, energy, critical mission, and code compliance.

We noted that such a process seems to provide a transparent and rigorous means to select projects. However, many of the projects on bureau project lists lack DOI scores, likely because scoring is based on construction and deferred maintenance needs, and therefore may not be adaptable to other types of projects, such as habitat restoration and equipment replacement. We also noted that OMB and Departmental guidance included other project selection criteria such as energy efficiency, use of renewable energy, youth, treasured landscapes, and national icons, but that the standard language did not address how these factors were considered in project selection.

The Department revised the standard language to note that the Departmental 5-year planning process was intended to focus limited resources on projects that are both mission critical and in the most need of repair/replacement. The language clarifies that this planning process is used only for construction and deferred maintenance and that no similar Department-wide process exists for other types of projects. The language notes that the processes for

selecting other types of projects are bureau-specific and described in each bureau program plan. The Department also revised the standard language to describe how each bureau allocates priorities among funding categories and identifies specific projects. The language notes that merit-based criteria were considered (pursuant to OMB guidance) as well as implementation readiness and operating cost reduction.

### *Barriers to Effective Implementation*

Adequate identification and communication of all barriers to effective implementation could help the Department and bureaus to ensure that Congress and the public understand the challenges faced in implementing the Act. Such information would also help the Department to meet the transparency and accountability goals of the Act. However, the draft standard language section on “barriers to effective implementation” identified only the lack of contract personnel as a barrier. While this area certainly poses a daunting challenge to effective implementation, we observed that other barriers exist. For example, effective monitoring and oversight of projects require more than contracting personnel. We have not conducted a review, but believe, based on discussions with Department officials, that there may be shortages of staff with technical skills for effective project oversight. Additionally, obstacles may exist in finding qualified businesses, especially small or disadvantaged businesses, to perform projects. Lack of qualified private sector entities could also limit competition or delay implementation.

The Department substantially revised the standard language on barriers to effective implementation. The Department added additional barriers, including the availability of qualified contractors to perform projects for multiple agencies that may compete for these contract resources. The Department also added that timely completion of design and permitting could delay specific projects. Finally, the updated standard language states that unforeseen events, such as wildfires, could impact staff that would support Recovery Act projects.

## **Observations on Bureau Program Plans That Have Been Addressed**

### **NPS Program Plan**

We reviewed the NPS draft program plan, dated April 8, 2009, and provided our observations to the bureau and Department. We reviewed the bureau’s final April 21, 2009 program plan to determine whether our observations were addressed. We discuss below the observations that NPS addressed and discuss in the next section those NPS did not address.

### *Funding Categories*

The NPS draft program plan stated that eight program areas would receive funding, but it named only seven program areas. It was unclear if “Administration” was intended to be the eighth program area. We noted that if so, clearly identifying administrative costs as a separate item, rather than including it as a program area, would improve the transparency of the plan.

NPS addressed our observation. The final program plan lists three appropriation accounts: Construction, Operation of the National Park System, and Historic Preservation Grants to Historically Black Colleges and Universities. These accounts correspond to the three funding

categories identified in the Recovery Act for NPS. NPS includes a total of nine program areas under the three appropriation accounts. They also broke out administrative costs separately. The additional clarity on appropriation accounts, programs, and administrative costs should help to improve transparency and tracking of expenditures under the Recovery Act.

### *Historically Black Colleges and Universities – Preservation Grants*

NPS received \$15 million under the Recovery Act to provide preservation grants to Historically Black Colleges and Universities. However, we observed the draft program plan did not contain any information on these grants. NPS provided information about these grants in the final program plan.

## **BLM Program Plan**

We reviewed the BLM draft program plan dated April 15, 2009 and provided our observations to the bureau and Department. We reviewed the bureau's final May 6, 2009 program plan to determine whether our observations were addressed. We discuss below the observations that BLM addressed and discuss in the next section those BLM did not address.

### *Oversight Structure*

We expressed concern over the description of the governance structure proposed for oversight of Recovery Act projects in BLM's draft program plan. Governance includes oversight of the Recovery Act projects. The plan notes that a single Recovery Act Project Manager will lead a team to ensure compliance with the Recovery Act and linkage "with program managers and state leads...to interpret guidance, eliminate barriers to success, and to monitor performance." The description of programs identify two program managers as Assistant Directors and one as a State Director; it was unclear what authority the Recovery Act Project Manager has vis-a-vis these program managers. We also expressed concern about the ability of the Assistant Directors to provide adequate oversight. Each is responsible for almost 300 Recovery Act projects. We noted that, given this large number of projects and their significant other responsibilities, it is important that these highly placed officials (and other officials assigned with Recovery Act responsibilities) be able to provide sufficient oversight of the Recovery Act projects for which they are responsible.

BLM addressed these issues in the "Governance at BLM" section of the final program plan. BLM has established a Recovery Oversight Committee (ROC) to govern the implementation of the Recovery Act. This committee includes a Recovery Act Project Manager. The Recovery Act Project Manager, in turn, heads a team responsible for the implementation of decisions by the ROC. This team includes representatives for Renewable Energy, Construction and Deferred Maintenance, Treasured Landscapes, and Hazardous Fuels. The plan states that:

The team links with program managers and state leads across the BLM to interpret guidance and eliminate barriers to success, and to monitor performance... In addition the Project Manager hosts weekly calls with State Coordinators to update the field on decisions of the ROC, new guidance from DOI or OMB, and to respond to questions. The project manager has authority to coordinate actions needed to implement the Recovery Act."

### *Project Selection – Project Completion Timeframes*

The draft program plan contained contradictory information regarding the criteria for selecting projects. The contradiction related to whether BLM intended to select projects that could be *completed* by September 30, 2010 or those that could meet the requirement, as prescribed in the Recovery Act, to *obligate* all funds by that date. The section “Process for Allocating Among Categories” referred to selection of projects that can be *completed* by September 30, 2010. The section “Deferred Maintenance” referred to *completion* in 18 months. However, the section “Recovery Act Funds Impact on 5-Year Plan” referred to the “1 October 2010 *obligation* requirement” (emphasis added). The plan also showed projects for several programs extending beyond 2010 in “Completion Rate” tables.

We observed that Recovery Act funds provided to BLM should be *obligated* by September 30, 2010 (Section 1603 of the Act). We expressed concern that BLM was potentially unduly restricting their choice of projects with the requirement to select only those projects that could be *completed* by September 30, 2010. We observed that if BLM meant *obligated*, it should correct the wording.

BLM addressed this issue in the final program plan. BLM replaced the word “completed” with the word “obligated.” This change helps to eliminate confusion over, and potential questions about, BLM’s criteria for project selection and target dates for completion.

### *Project Selection – Project Priorities*

The draft plan noted that “funding is provided to remediate the immediate physical safety hazards at 78 abandoned mines,” but later discussion of the Abandoned Mines in the draft plan identified 31 projects related to physical safety, 23 related to inventory and/or environmental issues, and 24 related to other issues. We observed that the plan, to be clear and transparent, should explain that abandoned mines can present both physical safety hazards and environmental hazards, the latter of which often require more time and resources to remediate effectively. BLM’s May 6, 2009 program plan explains that abandoned mines can represent both physical safety and environment hazards.

### *Inconsistencies in Information Presented*

We observed that in several of the draft program area discussions (Renewable Energy Authorizations, Habitat Restoration, Construction, Abandoned Mines, and Trails), the numbers of projects and/or estimated costs were different in the text and the accompanying tables. BLM corrected the inconsistencies in the final program plan.

### *Potential Barriers to Implementation*

We observed in the “Abandoned Mines” program discussion that 54 projects were to be performed by private firms under existing contracts. It was unclear in the draft plan if these existing contracts were modified to include Recovery Act terms and conditions or if modification might present a barrier to implementation.

We consider this issue addressed because the requirement of using existing contracts was eliminated from the final program plan. The final plan also revised from 54 to 66 projects to be performed by private firms. We note BLM must ensure it complies with requirements of the Recovery Act and the policy from the Office of Acquisition and Property Management regarding modification of existing contracts for implementation of Recovery Act projects.

### *Abandoned Well Program*

The Abandoned Well program in both the draft and final program plan consists of one large project in Alaska. BLM proposed to accomplish the project by using small businesses, Native owned businesses and minority owned service providers. If BLM intends to use this strategy of contracting with multiple entities rather than a single entity, it may create performance risks. We observed that BLM should ensure that they plan and monitor project execution and oversight adequately to ensure it is successful, and that they should also consider including a justification for using this strategy.

BLM did not address the observation mentioned above, nor did they provide reasoning for their strategy in their final program plan. We are including it in the section on issues that have been addressed because, subsequent to the issuance of the final program plan, a determination by the solicitor's office resulted in the requirement being classified as a "construction" project, rather than remediation. This reclassification caused a change in the acquisition strategy regarding the initial decision to utilize small businesses, native owned businesses, and minority owned service providers. The requirement now exists for both payment and performance bonds to equal 100 percent of the contract value *each*. The project is currently estimated to cost \$23.6 million. This dollar value would result in bonds totaling \$47.2 million (\$23.6 million for payment bonds and \$23.6 million for performance bonds). The original target vendors could be either unable to obtain these bonds or able to obtain them at a cost that places them at a competitive disadvantage over larger companies that can obtain the bonds significantly cheaper. BLM's National Centers Region published a solicitation seeking sources for the project.

### **USGS Program Plan**

We reviewed the USGS draft program plan, dated March 19, 2009, and provided our observations to the bureau and Department. We reviewed both the USGS response to our comments on their draft plan and the bureau's final April 10, 2009 program plan to determine whether our observations were addressed. Our observations and the response from USGS follow.

### *Upgrade to Stream Gauges*

The draft program plan stated "HDR [High Data Rate] radios will not decrease operational costs..." but it did not state whether costs would increase or whether future maintenance costs would be incurred. USGS responded that one of their project selection criteria was that Recovery Act projects would not increase the cost of future operations and maintenance.

### *Data Preservation*

We noted that the draft program plan included a “Data Preservation” project selected because “(it) was determined to be the highest priority for ARRA [Recovery Act] funding, given the risk of loss due to potential damage and limited access by others. This project is a high priority because of the importance of access to the information by the USGS, States, Universities, and others.” Since this statement did not address specific project selection criteria such as job creation, health and safety, or energy efficiency, we were unclear as to why it is the highest priority project.

USGS responded to our concern and noted that the project would contribute to job creation since youth would be employed for the project and that preservation of this data could contribute to improvement of human health as well as reduce costs for data storage.

### *Deferred Maintenance*

The draft plan stated that

USGS will address the highest priority deferred maintenance projects at its owned facilities. These projects will address health and safety issues, make facilities more energy efficient, and use sustainable design criteria in project implementation. The USGS annual deferred maintenance and capital improvement backlog is funded at about \$2.0 million per year. The Recovery Act funding will address almost 25 years of this backlog and at least one third of the current deferred maintenance backlog will be addressed.

We expressed concern that USGS claimed one third of the current deferred maintenance backlog will be addressed. In discussions with USGS, we understood that all of the 5-year deferred maintenance would be addressed.

USGS responded to our comment by noting that their original program plan was based on deferred maintenance needs outlined in the 2009 5-year plan. However, their latest plan is based on the 2010 5-year plan, which explains the difference in estimates of deferred maintenance backlog that will be addressed by Recovery Act funding.

### **FWS Program Plan**

We reviewed the FWS draft program plan, dated April 16, 2009, and provided our observations to the bureau and Department. We reviewed both FWS’ responses to our comments on their draft plan and the bureau’s final program plan, dated April 24, 2009, to determine whether our observations were addressed. Our observations and the response from FWS follow.

### *Project information missing*

The Department issued the “Economic Recovery Template and Guidance for Project Lists” that included general guidance and an excel spreadsheet template in which to list projects and several data elements—outlined in the guidance—for each project. This information was included in the program plan. In our review of the FWS draft program plan, we noted several problems with project information.

- Some projects lacked information required on the project template (e.g. a project in Alaska to replace a damaged culvert lacked a “Time to Complete” estimate; most projects did not complete the “Permitting and Consultation” column).
- FWS anticipated using different types of award vehicles for several similar projects, but provided no explanation on the necessity of this approach. There are specific rules for when an agency should use a contract, grant, or cooperative agreement. A contract is used when the government needs to obtain a good or service, a grant should be used only for a public purpose, and a cooperative agreement is an appropriate vehicle only when there is substantial involvement by both the government and the cooperator in the project. Using different vehicles for the same project or like projects should be explained to provide transparency as to whether the bureau considered the use of an appropriate vehicle.
- Several capital improvement projects were incorrectly listed in the deferred maintenance program area.
- The plan did not describe how required project elements (such as health and safety, energy efficiency, and renewable energy) were weighted for project selection. In particular, we noted that several construction projects were proposed for Recovery Act funding with DOI scores (5-year plan scoring methodology) lower than a project with a higher score.

FWS stated they addressed all of our comments by completing all data elements in the project template, correcting the project list, or revising language in the plan. We verified that they addressed in the final program plan each item we identified. They also included a chart that explains each type of award vehicle that will be used.

### *Bureau Governance Structure*

We observed that the FWS workgroup being established for ensuring compliance with the Recovery Act did not appear to include acquisition staff as members. Since acquisition is a formidable challenge given the time-frames envisioned in the Act, we expressed concerns that they were not represented in the oversight workgroup. FWS responded that the Assistant Director, Business Management and Operations is a member of the workgroup. The Bureau Procurement Chief reports to this individual, and therefore, FWS stated that the acquisition staff has representation in the workgroup through this Assistant Director.

## Observations on Bureau Program Plans That Were Not Addressed

### NPS Program Plan

#### *NPS Project Lists and Selection*

The NPS rationale for selecting certain projects was not fully explained in the draft or final program plan. We observed that many projects on the draft NPS project list, dated April 8, 2009 (on which the program plan was based), had relatively low DOI scores.<sup>2</sup> For example, 175 of the 769 projects had a score below 500 out of a possible 1,000. We also noted that 44 projects (estimated to cost a combined total of about \$52 million) had no score. We understand that projects with higher scores may have been excluded because they may not be ready for implementation, and completing them in the Recovery Act timeframes may not be feasible. We also realize that the DOI score is based on construction and deferred maintenance, and therefore may not be adaptable to projects such as habitat restoration, renewable energy, and equipment replacement. However, the rationale for incorporating projects with a lower priority, or projects with no DOI score, should be transparent but was not explained.

In addition, the Department issued guidance (“Economic Recovery Template and Guidance for Project Lists” dated February 20, 2009) describing categories to consider in project selection. These criteria are different from those included in the 5-year plan criteria, and they include energy efficiency, use of renewable energy, youth, treasured landscapes, and national icons. The draft program plan did not describe how these factors were considered in project selection, and no explanation was added to the final plan.

We also noted a discrepancy between the project lists we reviewed and the projects mentioned in the draft program plan. The NPS project lists indicate that 701 projects (both construction and non-construction) were selected from the bureau’s “5-year plans.” The program plan refers to a construction 5-year plan and a deferred maintenance 5-year plan, and it notes that the total number of projects selected from these two plans is 447, which is different from the project lists. We suggested that NPS clarify or reconcile these differences. The final program plan contains the same discrepancy.

#### *Cooperative Agreements and Contracts*

The plan indicates in several places that NPS will use both cooperative agreements and contracts for the same project. These projects fall into the abandoned mines and deferred maintenance categories. As stated under the discussion of FWS, specific rules exist for when an agency should use a contract, grant, or cooperative agreement. We observed that NPS should explain why different types of procurement vehicles will be used for similar types of work. Additionally, we have observed in prior evaluations that the Department does not always select or implement cooperative agreements appropriately.<sup>3</sup>

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<sup>2</sup> These scores are developed based on a specific process, which is described in the plan.

<sup>3</sup> *Proper Use of Cooperative Agreements Could Improve Interior’s Initiatives for Collaborative Partnerships*. January 2007. W-IN-MOA-0086-2004.

NPS did not address this issue in their final program plan. There is no additional explanation as to why certain projects will require two different types of proposals.

## **BIA Program Plan**

### *BIA Governance*

The draft plan described the governance function within Indian Affairs. The plan noted that a senior-level workgroup will oversee Recovery Act fund allocation, status of obligations and outlays at the appropriation and funding category level. The plan also stated, “additional review will occur at the project level by program managers with oversight of this workgroup as warranted.” The plan did not describe *how* program managers will oversee performance of projects, which may be conducted in-house or by contract (direct to contractors or to tribes via Public Law 93-638 contracts).

We expressed concern that program managers’ spans of control and authority may not allow identification of problems in a timely enough fashion to ensure corrective action is taken when problems arise. For example, some program managers are responsible for programs estimated to cost up to several hundred million dollars. In addition to overseeing Recovery Act funds, the Transportation program manager (BIA road maintenance program) is also responsible for highway construction funds allocated to BIA or tribes by the Federal Highway Administration. These funds total several hundred million dollars. We observed that the Department and bureaus should ensure that program managers have adequate support to ensure effective oversight.

The issue was not addressed in the final program plan.

### *Housing Improvement Program*

The plan notes that one new construction project will be completed by the 3<sup>rd</sup> quarter of fiscal year (FY) 2009 (e.g. June 2009) and three projects completed in the 4<sup>th</sup> quarter of FY 2009 (e.g. September 2009). We observed that this schedule seems ambitious. BIA included this schedule in its final program plan, and we are unaware of any construction projects completed with Recovery Act funds.

### *School Replacement Construction and School Improvement and Repairs*

The top five school construction projects proposed are estimated to cost a total of \$135 million. BIA noted that projects were selected with completed designs or capable of being “fast-track, design-build construction.” Several large projects were also proposed in the School Improvement and Repair program.

BIA did not describe how they will oversee these large projects in an effective and timely manner to preclude cost growth or schedule creep. For these large projects, we urged BIA to ensure it exercises effective oversight. We also observed it could be beneficial to develop a process to identify instances when cost and/or performance targets were not met and to take corrective actions when necessary.

BIA did not address this issue in the final program plan. Oversight on these large projects remains a concern.

## **Conclusion**

We are encouraged that the Department and bureaus shared the majority of program plans with us for comment and that the majority of our comments were addressed in final program plans. Many of our observations pertained to inconsistencies contained in the plans or points of clarification needed. We believe the changes made by the Department and bureaus will help to meet the transparency requirements under the Recovery Act.

Many of the areas that were not addressed in the program plans, such as the appropriate use of cooperative agreements and ensuring effective management and oversight of dollars dedicated to Indian programs, have been long-standing challenges in the Department. We will continue to work with the bureaus and the Department to ensure these programmatic areas are addressed.

cc:     Acting Assistant Secretary – Policy, Management and Budget  
         Director, Office of Acquisition and Property Management  
         Director, Office of Financial Management  
         Director, Indian Affairs  
         Director, Bureau of Land Management  
         Director, U.S. Fish and Wildlife Service  
         Director, National Park Service  
         Director, U.S. Geological Survey  
         Recovery Coordinator, Assistant Secretary Indian Affairs  
         Recovery Coordinator, Bureau of Indian Affairs  
         Recovery Coordinator, Bureau of Land Management  
         Recovery Coordinator, U.S. Fish and Wildlife Service  
         Recovery Coordinator, National Park Service  
         Recovery Coordinator, U.S. Geological Survey  
         Departmental GAO/OIG Audit Liaison  
         Audit Liaison, Office of the Secretary  
         Audit Liaison, Bureau of Land Management  
         Audit Liaison, Indian Affairs  
         Audit Liaison, National Park Service  
         Audit Liaison, U.S. Fish and Wildlife Service  
         Audit Liaison, U.S. Geological Survey

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